

MEMO ENDORSED

IT IS ORDERED that counsel to whom this Memo
Attachment is sent is responsible for faxing or
otherwise delivering promptly a copy to all counsel
unrepresented parties and filing a certificate of
service within 5 days from the date hereof. Do
each certification to Chambers.

RICHARD A. ZIMMERMAN
ATTORNEY AT LAW
SUITE 2202
233 BROADWAY
NEW YORK, NEW YORK 10279

TELEPHONE (212) 962 1818
TELEFAX: (240) 218 6456

E MAIL: zimmny@attglobal.net
WEB: richardzimmerman.com

December 4, 2007

Via Facsimile: (212) 805-0426

Total Two (2) Pages

Honorable Laura T. Swain
United States District Judge
United States District Court
500 Pearl Street, Room 755
New York, NY 10007

Re: *MED-ASIA SHIPPING LIMITED,*
v. OCEANIC BRIDGE INTERNATIONAL, INC., d/b/a
OCEANIC BRIDGE INTL INC. DALIAN BRANCH, a/k/a DALIAN
OCEANICBRIDGE INTERNATIONAL FORWARDING CO., LTD.,
USDC/SDNY: 07 CV 6258 (LTS) (AJP)

Dear Judge Swain:

We represent the Plaintiff in the above captioned action. We are joined in the below request by our colleagues NICOLETTI HORNIG & SWEENEY, attorneys for the Defendants.

We write to request the Court's consent to adjourn the initial pre-trial conference, presently scheduled for December 7th, 2007, until after the Court has decided the defendant's motion to certify and permit an immediate interlocutory appeal from the Court's October 12, 2007 Order.

There has been one previous request for adjournment of the initial pre-trial conference, which request was granted. Also, the originally scheduled initial pre-trial conference was postponed, with the consent of the Court, while the Court heard and decided the Defendants' motions for dismissal and vacatur of the attachment. On October 12, 2007, the Court denied the Defendants' motions in their entirety.

Defendant's present pending motion is directed at the Court's Order of October 12, 2007.

Faxed
Copies ~~mailed~~ *to PIA Counsel*
Chambers of Judge Swain *12-6-07*

This case is a Rule B Admiralty attachment matter, with an underlying arbitration agreement. It is fully expected that the merits of the claims will be decided at arbitration in Hong Kong. We have been advised by our client's Hong Kong counsel that the arbitration is moving forward, but so far without the participation of the California company, Oceanic Bridge International, Inc. That same California company has brought the present motion to certify the appeal.

We intend to oppose defendant's pending motion and to cross-move for an order to compel Oceanic Bridge International Inc. to appear and participate in the Hong Kong arbitration.

Setting forth a schedule for briefing the motion, we propose that plaintiff's opposition papers be submitted by December 19th, 2007, including any cross-motions, and that defendant's reply papers, if any, including opposition to any cross-motion, be submitted during the first full week of January 2008, say January 9th, 2008. Reply papers on the cross-motion, if any, would be due on January 16th, 2008. Oral argument on the motion(s) be set for Friday January 18th, 2008 at a time convenient for the Court, or at any date and time thereafter convenient for the Court.

The requested adjournment does not affect any other scheduled dates in this matter and will allow the Court and the parties to better focus their attention on the pending motion.

This request is being simultaneously faxed to Chambers and the attorneys for the Defendants. A hard copy will not follow.

Respectfully submitted,




Patrick C. Crilley
Of Counsel
Direct Phone (212) 619-1919
Direct Fax (212) 214-0311
Email: lawyerny@erols.com

The proposed schedule and adjournment request are approved. The motions will be taken on submission unless the Court informs the parties that oral argument will be heard.

CC: James F. Sweeney, Esq.
NICOLETTI HORNIG & SWEENEY
Attorneys for Defendants
Via Facsimile: (212) 220-3780

SO ORDERED.



12/5/2007
LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE